

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

YLOWCAKE, INC., a California) **Case No.: 1:20-CV-00988-JTL-BAM**
corporation,)
Plaintiff,) **STIPULATION TO EXTEND TIME**
v.) Magistrate Judge: Barbara A. McAuliffe
HYPHY MUSIC, INC.,)
Defendant.)

HYPHY MUSIC, INC.,)
Counterclaimant,)
v.)
YELLOWCAKE, INC., COLONIZE)
MEDIA, INC., JOSE DAVID)
HERNANDEZ, JESUS CHAVEZ, SR.,)

Counterdefendants.

Plaintiff/Counterdefendants Yellowcake, Inc., Colonize Media, Inc and Jose David Hernandez (“Plaintiff/Counterdefendants”), Defendant/Counterclaimant Hyphy Music, Inc. (“HMI”), and Defendant Jesus Chavez, Sr. (“Chavez”, and together with Plaintiff/Counterdefendants and HMI, the “Parties”) hereby agree and stipulate to the following for the reasons set forth below:

1 1. On February 22, 2023, this Court entered an amended scheduling order in
2 this case (ECF No. 69) (“Amended Scheduling Order”).

3 2. Pursuant to the Amended Scheduling Order, the dispositive motion filing
4 deadline is July 14, 2023.

5 3. On May 19, 2023, HMI filed its Motion for Summary Judgment (ECF No.
6 78).

7 4. The Parties met and conferred regarding the briefing schedule for the
8 motion for summary judgment that has been filed in this case by HMI and the motions
9 for summary judgment that may be filed in this case by Plaintiff/Counterdefendants and
10 Chavez.

11 5. Given that there have been three (3) motions filed (one motion filed thus
12 far in this case and two motions for summary judgment filed in *Yellowcake v. Morena*,
13 *et al.*, Case No. 1:20-cv-0787), given that Plaintiff/Counterdefendants and HMI are
14 represented by the same counsel in both cases, given the past and upcoming holidays
15 (Memorial Day, Jewish Holiday of Shavuot, and Independence Day), and given that the
16 Court stated in its Minute Order dated May 23, 2023 (ECF No. 79) that “it is likely to
17 be six or more months until the motion(s) in this matter be resolved,” the Parties stipulate
18 and agree as follows:

19 (a) On or before July 14, 2023, Plaintiff/Counterdefendants and Chavez
20 shall file their motion for summary judgment.

21 (b) On or before August 15, 2023, the Parties shall file their respective
22 oppositions to the Motions for Summary Judgment filed by the other Parties.

23 (c) On or before September 15, 2023, the Parties shall file their respective
24 replies to the opposition filed by the opposing Parties.

25 Good cause therefore exists to modify the Amended Scheduling Order as set forth
26 above.

27 There has been no previous request for an extension of time in connection with
28 this matter.

1 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**
2

3 Dated: May 31, 2023

ABRAMS, FENSTERMAN, LLP

4 By: /s/ Seth L. Berman

5 Seth L. Berman, Esq. (*pro hac vice*)

6 *Attorneys for Plaintiff/Counterdefendants*
7 *Yellowcake, Inc., Colonize Media, Inc.,*
8 *and Jose David Hernandez*

9 Dated: May 31, 2023

ALTVIEW LAW GROUP, LLP

10 By: /s/ John Begakis

11 John Begakis, Esq.

12 *Attorney for Defendant/Counterclaimant*

13 Dated: May 31, 2023

WHITNEY, THOMPSON & JEFFCOACH LLP

14 By: /s/ William H. Littlewood

15 William H. Littlewood, Esq.

16 *Attorneys for Counterdefendant*
17 *Jesus Chavez, Sr.*